

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TQ Delta, LLC,  
*Plaintiff,*

v.

CommScope Holding Company, Inc., *et al.*,  
*Defendants.*

Civil Action No.: 2:21-CV-00310-JRG

JURY TRIAL DEMANDED

**DECLARATION OF RAJENDRA A. CHIPLUNKAR**

I, Rajendra A. Chiplunkar, state as follows in support of Plaintiff TQ Delta, LLC's Motion to Strike The Invalidity Report of Defendants' Expert, Mark Lanning:

1. I am a partner at McAndrews, Held & Malloy and counsel of record for TQ Delta, LLC. I am a member of good standing of the State Bar of Illinois. I have personal knowledge of the facts set forth in this Declaration.
2. Exhibit A contains a true and correct copy of U.S. Patent No. 9,154,354.
3. Exhibit B contains a true and correct copy of U.S. Patent No. 8,937,988.
4. Exhibit C contains a true and correct copy of the Opening Expert Report Of Mark R. Lanning On The Invalidity Of The Asserted Claims Of The Family 10 Patents (U.S. Patent Nos. 9,154,354; 8,937,988) (exhibits excluded).
5. Exhibit D contains a true and correct copy of excerpts from the transcript of the December 2, 2022 deposition of Mark R. Lanning (rough).
6. Exhibit E contains a true and correct copy of a November 9, 2022 email from CommScope's counsel identifying CommScope's final election of prior art.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 14<sup>th</sup> day of December 2022, in River Forest, Illinois.

/s/ Rajendra A. Chiplunkar  
Rajendra A. Chiplunkar